

Suzanne L. Martin  
Nevada Bar No. 8833  
suzanne.martin@ogletree.com  
Kathryn C. Newman  
Nevada Bar No. 13733  
kathryn.newman@ogletree.com  
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.  
10801 W. Charleston Blvd., Suite 500  
Las Vegas, NV 89135  
Telephone: 702-369-6800  
Fax: 702-369-6888

*Attorneys for Defendant, Lucky Top Inc. d/b/a  
Hey Dude Shoes*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MANUMALO TUINAMALA, an individual,  
  
Plaintiff,

vs.

LUCKY TOP INC., a foreign corporation,  
d/b/a HEY DUDE SHOES,  
  
Defendant.

Case No.: 2:24-cv-01783-CDS-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANT TO  
FILE RESPONSE TO PLAINTIFF'S  
COMPLAINT  
  
(FIRST REQUEST)**

Pursuant to Local Rules IA 6-1 and IA 6-2, Defendant Lucky Top Inc. d/b/a Hey Dude Shoes (“Defendant”) and Plaintiff Manumalo Tuinamala (“Plaintiff”), by and through their undersigned counsel, hereby requests a fourteen-day extension of time, up to and including, December 5, 2024 for Defendant to file its response to Plaintiff’s Complaint (ECF. No. 1). The present deadline for Defendant to file its response is November 21, 2024. This is the parties’ first request for an extension of time for Defendant to file its response.

The parties have stipulated to the extension of time for the following reasons:

1. Defendant just recently learned of service of process, and it needs time to conduct an initial assessment of the complaint and an appropriate response.

2. This request for time was made in good faith and not for purposes of delay.

///

For the foregoing reasons, the parties respectfully request a fourteen-day extension of time up to and including December 5, 2024, for Defendant to file its response to Plaintiffs' Complaint.

DATED this 12<sup>th</sup> day of November, 2024.

HATFIELD & ASSOCIATES, LTD.

/s/ Trevor J. Hatfield/

Trevor J. Hatfield  
Nevada Bar No. 7373  
703 South Eighth Street  
Las Vegas, Nevada 89101

*Attorneys for Plaintiff,  
Manumalo Tuinamala*

DATED this 12<sup>th</sup> day of November, 2024.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART,  
P.C.

/s/ Kathryn C. Newman

Suzanne L. Martin  
Nevada Bar No. 8833  
Kathryn C. Newman  
Nevada Bar No. 13733  
10801 W. Charleston Boulevard, Suite 500  
Las Vegas, Nevada 89135

*Attorneys for Defendant,  
Lucky Top Inc. d/b/a Hey Dude Shoes*

**ORDER**

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

11/13/2024  
DATED